

**FELICELLO**

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April 4, 2022

VIA ECF

Hon. Victor Marrero  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: *Baliga, et al. v. Link Motion Inc., et al.*, Case No. 1:18-cv-11642-VM-DCF (S.D.N.Y.)  
Order to Show Cause issued March 16, 2022 (Dkt. No. 277, the “Order to Show Cause”)

Dear Judge Marrero:

We represent Defendant Vincent Wenyong Shi (“Dr. Shi”). On March 25, 2022, the Court extended the temporary restraining order (“TRO”) entered on March 16, 2022 (ECF Dkt. No. 277) by ten days and directed the parties to negotiate a standstill agreement to extend the TRO pending a ruling on objections to the Report & Recommendation and Discharge Motion (as those terms are defined in our application at ECF Dkt. No. 276 to 276-6). (ECF Dkt. No. 292.) We regret to inform the Court that we have been unable to reach agreement with counsel for Plaintiff and the Receiver.<sup>1</sup>

Accordingly, we respectfully submit that there exists good cause to extend the TRO and request that the Court enter an order reflecting the last proposal we conveyed to counsel for the Plaintiff and the Receiver:

Pursuant to Rule 65(b)(2) of the Federal Rules of Civil Procedure, the Court’s temporary restraining order entered on March 16, 2022 (ECF Dkt. No. 277), previously extended by ten days by Order dated March 25, 2022 (ECF Dkt. No. 292), is hereby extended up to and including the date on which the Court enters a ruling on objections to the Report & Recommendation and the Discharge Motion.

Respectfully submitted,

*/s/ Michael James Maloney*

Michael James Maloney

cc: All counsel of record (via ECF)

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<sup>1</sup> Despite extensive email and telephone communications, Plaintiff’s counsel has continued to request inclusion of language not related to the issues presented in the TRO and, therefore, unacceptable.